



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, ILLINOIS 60604

REPLY TO THE ATTENTION OF: SR-6J

VIA ELECTRONIC MAIL AND CERTIFIED MAIL

July 31, 2008

EPA Region 5 Records Ctr.



308484

Weyerhaeuser Company  
Attn: Jennifer Hale  
7800 East Orchard Road, Suite 200  
Greenwood Village, Colorado 80111

RE: Plainwell Mill, Operable Unit #7, Allied Paper/Portage Creek/Kalamazoo River Site

Dear Ms. Hale:

In July 2008, Weyerhaeuser Company submitted a draft *Phase 2 Addendum No.1 to the Remedial Investigation/Feasibility Study Work Plan* (Work Plan) for the above referenced Site. The United States Environmental Protection Agency hereby disapproves Weyerhaeuser Company's proposed addendum and provides the following comments.

- Comment 1. Section 2.2 – Please clarify the first paragraph on page four so that we can readily discern which structure on the Sanborn maps correspond to what you refer to as “a small storage shed.” Also, please specify which Sanborn maps are included in Appendix A within the text of this section, or include the absent Sanborn Maps Appendix A.
- Comment 2. Section 2.3 – Please remove the “above applicable Part 201 criteria.” from the last sentence of the paragraph.
- Comment 3. Table 1 – The “Significance” column of the “RMT Plainwell Mill Banks Emergency Action” row does not contain a synopsis of the data. Please replace the existing text with a synopsis of the data. Additionally, the title of the last column could be changed to more accurately describe the information contained in that column. Finally, the sediment sample (SPD-1) from the BBL-1996 investigation is not included. It was tested for PCBs and PCDD/PCDF.
- Comment 4. Section 2.4.1 – On page 5, the webpage listed at the end of the first paragraph no longer exists. A new source is needed.
- Comment 5. Section 2.4.1 – In the second paragraph of page 5, please replace “significantly decreased” with an actual number. Additionally, the statement following “significantly decreased with depth” does not provide sufficient rationale as to why there are no impacts in the immediate vicinity of the 300-gallon UST.

Please provide the rationale. Finally, please remove references to Part 201 Criteria.

Comment 6. Section 2.4.1 – In the third paragraph of page 5, please remove the references to Part 201 Criteria.

Comment 7. Section 2.6 – In the first paragraph of page 7, you state that outfalls could create preferential migration pathways. In the context of this site, the text should reflect outfalls and associated subsurface conveyances as being preferential migration pathways, not as the cause of preferential migration pathways.

Comment 8. Table 2 – Please provide a source for information in this table.

Comment 9. Section 3 – In paragraph 3 of page 10, you mention an inspection of a manhole, please provide (1) a detailed discussion of the steps performed in the execution and completion of this inspection and (2) the record of the inspection.

Comment 10. Section 3 – In paragraph 1 of page 11, please delete “do not appear to be associated” and instead clarify what you meant by that phrase, i.e. are the elevated concentrations of PCB in the soil not collocated with any of the Metallic Objects.

Comment 11. Section 4 – Page 13, bullet 2, please indicate where the electrical equipment was located.

Comment 12. Section 4.2 – Should the CSM also take into consideration the sewer line immediately southeast of the high PCB concentrations? If not, please provide the rationale.

Comment 13. Table 5 – The “Rationale” column for number three does not have any rationale for having or not having test pits. Please edit the text to include the rationale for test pits.

Comment 14. Section 5.1 – Page 17, Paragraph 3 – Please specify how the soil types will be classified and by whom.

Comment 15. Section 5.1 – Page 17 – Bullets – Please specify if these are tiered in any way. Please specify how background will be determined.

Comment 16. Section 5.1 – Table 6 – EPA and MDEQ believe the location, number, and sampling (analytes and frequency of samples per test pit) of test pits should remain flexible to accommodate for field conditions. Also, please incorporate the possibility of digging below the water table, and sampling pooled liquids in a test pit. Please incorporate the necessary changes in the Multi-Area Quality Assurance Project Plan and other site plans.

Comment 17. Section 5.1 – Please allow for the re-interpretation of the geophysical survey data based on the test pit findings.

Comment 18. Section 5.1 – Paragraph 1 of page 18 calls for the off-site disposal of material. Please provide details for the characterization, storage, and schedule for removal of the material designated for disposal as well as the name and address of the facility being used for disposal. This information should be provided prior to work commencing.

Comment 19. Section 5.1 – Page 18 – Paragraph 2 – The existing site Spill Contingency Plan should be updated to consider the possibility of encountering leaking drums or underground storage tanks. Please provide an updated copy prior to the commencement of work.

Comment 20. Section 5.2 – As discussed with MDEQ and EPA, please limit or eliminate the groundwater portion of this focused study. EPA and MDEQ are available for additional discussions on this subject, and are also available to discuss groundwater sampling for the Remedial Investigation.

Comment 21. Please provide the following, if available, prior to commencement of work: the analytical information from Consumers Power, design of the clay and rip-rap over the area, and the description of soils associated with the high PCB concentrations (e.g. texture, color, residual content, organic content, etc.).

Please revise the Work Plan and associated site plans according to these comments and submit the revisions for review. Thank you for your attention to this matter. Please do not hesitate to call me at 312.886.1434, should you have any questions related to the project.

Sincerely,



Sam Chummar, Remedial Project Manager  
U.S. EPA Region 5  
Superfund Division – Remedial Response Branch #1  
77 W Jackson Blvd. (SR-6J)  
Chicago, IL 60604

cc: Eileen Furey, C-14J  
Nicole Wood, C-14J  
James Saric, SR-6J  
Paul Bucholtz, MDEQ

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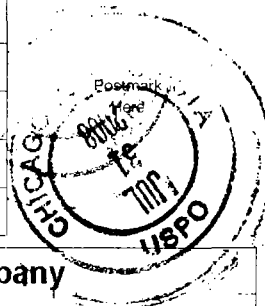
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or PO

**Attn: Jennifer Hale**

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**7800 East Orchard Road, Suite 200**

**Greenwood Village, Colorado 80111**

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**Weyerhaeuser Company**  
**Attn: Jennifer Hale**  
**7800 East Orchard Road, Suite 200**  
**Greenwood Village, Colorado 80111**

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